

The purpose of the National Environmental Policy Act (NEPA) is to require all Federal Agencies to fully evaluate the environmental effect of Federal actions.

Executive Order 11514, Section 309 of the Clean Air Act, the Council on Environmental Quality guidelines, and PBS Order 1095.1A, December 2, 1971, prescribe procedures to be used for implementing the NEPA. The purpose of this memorandum is to implement all these procedures and to establish a method for documenting the evaluation of proposed actions in the Office of Operating Programs (PM).

On March 31, 1972, I established a new Environmental Quality Committee which drafted procedures for implementation of environmental consideration in the Office of Operating Programs. The Environmental Quality Committee is my authorized representative in environmental matters and is responsible for controlling and enforcing the provisions of this memorandum.

This committee will meet no less than once a month to review all projects monitored through PM to assure that they have been properly reviewed and that necessary documentation has been prepared. The committee's concurrence will be required on all documentation.

The committee will be responsible for developing and providing necessary training to appropriate employees of the Office of Operating Programs so they are knowledgeable of the procedures to be followed.

According to the Guidelines of the Council on Environmental Quality, which are included with PBS 1095.1A (Attachment D) the determination of need for an Environmental Statement is the responsibility of the "lead agency". In many cases GSA will not be construed as the "lead agency". However, this does not relieve us of all responsibility for the environmental determination. Since we are a service agency, it is our responsibility to ensure that an adequate evaluation and determination or statement has been made.

We must consult with the "lead agency" to confirm that compliance with the NEPA has been achieved. As a service agency and as experts in the area of design, leasing, site selection and construction, we must be prepared to offer all necessary assistance.

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Our initial project file is affected by PBS 1095.1A. To ensure that we comply with the NEPA, every project monitored through this office will have a reference in the official file concerning its environmental impact. These projects shall include but not be limited to:

- Master Plans
- New Construction
- Heating Plant Conversions
- Sewage Treatment Facilities
- Building Demolition
- Building Cleaning (Exterior)
- Incinerators
- Alterations in Existing Buildings (Leased & Owned)
- Licenses, Easements, and Permits
- Site Acquisition
- Design
- Relocations

It will be the responsibility of the Office of Operational Planning to prepare the necessary documentation for future prospectus projects. However, it will be the responsibility of the Environmental Quality Committee to review these statements or determinations at appropriate intervals to evaluate whether subsequent developments necessitate a revision of PG's statement.

To maximize our effectiveness in the environmental area, a three step procedure will be utilized:

- (A) Preparation of an Environmental Analysis Checklist for each project.
- (B) If deemed needed an Environmental Determination will be prepared.
- (C) If deemed needed a Draft Environmental Impact Statement will be prepared.

When reviewing each project, an Environmental Analysis Checklist (see Attachment A) will be prepared and submitted for review and concurrence of the Environmental Quality Committee. If it is evident that a project is not a major Federal Action or will not have any measurable effect on environment, the memorandum (see Attachment B) is to be completed, executed and a copy placed in the official project file. The review and

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complete responsibility for determining whether an action is "not major" and/or will not "significantly affect" the quality of the human environment is delegated to the Environmental Quality Committee. It is estimated that a significant majority of the projects monitored through PM will fall into this category.

However, if after completing the Environmental Analysis Checklist and its review by the Environmental Quality Committee it is decided that the project will have a probable environmental impact, will be environmentally controversial, or is a major Federal Action, then a Detailed Analysis of the proposed project must be prepared (utilizing the outline in Attachment C).

This analysis should provide information to enable judgement as to whether the project does or does not require a Draft Environmental Impact Statement. Environmental Analysis and Draft Environmental Impact Statement will be prepared at the direction of the Environmental Quality Committee which will monitor closely their development and if necessary actually prepare the needed documents.

When preparing a determination or draft statement, the following material will serve as a source of factual data and should be reviewed:

- (1) Prospectus (PG)
- (2) Planning Document (PG)
- (3) Master Plans (PG)
- (4) Site Selection Report (PMRAP)
- (5) Appraisal Report (PMRAP)
- (6) Design Studies (PMCD)
- (7) Design Concepts (PMCD)
- (8) Prior Environmental Determinations (PG, PMR, PMC or Lead Agency)
- (9) Documentation of Consultations with appropriate approval authorities outside GSA (PG or Lead Agency)
- (10) Project Directors or Project Managers
- (11) Buildings Manager in project area (3PF\_)
- (12) Environmental Quality Committee reference files

Environmental Determinations must include the technical content listed in Attachment C. It is essential that each item of the technical content be mentioned, even if a negative comment is appropriate. A reader of the determination must know that each facet was considered. Some of the items in the outline are further clarified below:

Item 3 (Attachment C - Environmental Determination)

Unavoidable Adverse Impact

We cannot overstress the importance of discussing all controversial and adverse aspects of the project.

The NEPA does not prohibit projects which are determined to have adverse impact, but only insists that the environmental determination address each of these impacts and consider possible alternatives.

Item 4 (Attachment C - Environmental Determination)

Coordination with Responsible Agency

(b) Alternatives to the Proposed Action. This is the most important part of the determination. The NEPA intends to assure a thinking process in which it is essential to fully consider and evaluate alternatives. Therefore, alternatives must be documented. Amplify discussion of conditions cited under 1, 2, 3, 5 and 6 of technical content. Try to cover as much as possible, but only provide significant detail on important categories.

It is only after all these factors have been considered that an objective evaluation of the project can be made. A judgement must be made as to whether beneficial aspects of the project outweigh its adverse impact(s). After this judgement has been made, the Environmental Quality Committee will determine whether or not a project is a major Federal Action significantly affecting the environment. When it is not, a determination will be prepared for the signature of the Assistant Commissioner for Operating Programs, with approval by the Commissioner of PBS and by the Executive Director, Office of Environmental Affairs, ADF. When it is determined that a formal environmental statement is necessary, the environmental determination should be retitled "Draft Environmental Statement" and the same procedure utilized as for an Environmental Determination.

When it is necessary to file a Draft and Final Environmental Statement, the PM Environmental Quality Committee will direct its preparation and if necessary actually prepare the Statement for filing.

The above-mentioned procedure also applies to corporation requesting easements, permits, or licenses from GSA. The procedure will be followed before any such documents are released.

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In special cases, some projects may be controversial enough that a public hearing might be required. If such action is recommended by the committee, it will be forwarded to the Assistant Commissioner, Office of Operating Programs for his concurrence and forwarded to the Commissioner, Public Buildings Service for approval.

Some environmental statements and/or determinations will be released during early stages of the project (i.e., site acquisition). It is possible that circumstances can develop at a later date which might require the statement to be revised and reissued. The monitoring of these statements will be the responsibility of the Environmental Quality Committee.

Should GSA be requested to prepare an Environmental Statement or Determination for an agency, it will be done on a reimbursable cost basis. This should be specified in our Memorandum of Understanding and Agreement (GSA Form 2100) since this cost is not absorbed in our usual management fee. Such Environmental Statements may be accomplished by PM staff or by contract.

ENVIRONMENTAL ANALYSIS CHECKLIST

PROJECT NEED:  
LOCATION:  
TYPE OF FACILITY:

IMPACT ON THE ENVIRONMENT

	YES	NO	COMMENTS
(1) Air			(Insert Comments for all "yes" items)
(2) Weather Modification			
(3) Energy Transmission (gas & electric)			
(4) Hazardous Substances			
(5) Transportation			
(6) Land Use			
(7) Historic Sites			
(8) Noise			
(9) Sanitation and Waste Systems			
(10) Urban Planning			
(11) Water Quality			
(12) Pesticide Control			
(13) Wildlife			

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Prepared By: \_\_\_\_\_  
Activity Symbol: \_\_\_\_\_  
Date: \_\_\_\_\_



DATE:

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REPLY TO  
ATTN OF:

Environmental Quality Committee (PM)

SUBJECT:

Environmental Quality Analysis and Review

This document and the attached Environmental Analysis Checklist, when fully executed, are to be filed in the official file for the project know as: \_\_\_\_\_

Project Cost: \_\_\_\_\_

Project Location: \_\_\_\_\_

Project Description: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

This project has been evaluated in compliance with PBS Order 1095.1A. After considering the impact this project will have on the environmental conditions listed in the Council on Environmental Quality Guidelines (i.e., Air, Land Use and Management, Noise, Transportation, Water, Urban Planning, Wildlife, etc.) we have determined that this not a major Federal action significantly affecting the quality of the human environment.

Attachment B

This document is to be made a permanent part of this project's official file.

CONCUR:

Environmental Quality Committee

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CONCUR:

Division Director(s)

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CONCUR:

Assistant Commissioner (PM)

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ENVIRONMENTAL ANALYSIS OUTLINE

The following outline is intended to aid personnel from the Office of Operating Programs in making an environmental analysis.

So that the person making the study may have some assurance that all aspects of any particular project are considered. The following outline is to be used as a reference while making the analysis.

(1) Background of the Project

- (a) What is the need
- (b) Why this location
- (c) Type of facility

(2) Impact on the Environment

- (a) Air
- (b) Weather modification
- (c) Energy transmission (gas & electric)
- (d) Hazardous substances
- (e) Transportation
- (f) Land use
- (g) Historic Sites
- (h) Noise
- (i) Sanitation & Waste Systems
- (j) Urban Planning
- (k) Water Quality
- (l) Rodent Control
- (m) Wildlife

(3) Unavoidable Adverse Impact

- (a) Any categories under No. 2
- (b) Is this project still justifiable considering any adverse impact(s)

(4) Coordination with Responsible Agency

- (a) Who is lead agency?
- (b) Describe alternative proposals - give costs, impact, etc.
- (c) Utilize technical knowledge of responsible agency

- (a) If adverse impact, it is for  
    (aa) Short period - (construction noise, etc.)  
    (bb) Long period - (forest removal, etc.)

(6) Irretrievable Commitments of Resources

This is not normally a significant aspect of PBS actions. Where it is a factor, this is most likely to be in the area of land use.

(7) Cost Benefit or Deficit

Attachment C